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December 13, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: *Unbundled Access to Network Elements*, WC Docket No. 04-313 and
Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338

Dear Ms. Dortch:

On behalf of BellSouth, Qwest, SBC, and Verizon, I am writing in response to a specific request from Dan Gonzalez of Commissioner Martin's office for additional data regarding the extent to which competing carriers are purchasing high-capacity circuits as special access rather than as UNEs. Pursuant to 47 C.F.R. § 1.1204(a)(10), this submission is exempt from the sunshine period prohibition against ex parte presentations.

The attached spreadsheets list the competing carriers purchasing special access in the four Bell companies' regions. The first spreadsheet (Attachment 1) provides, for each competing carrier, the total number of DS1 circuits purchased as special access (Column B), the total number of DS1 circuits purchased as UNEs (Column C), the total number of DS1 circuits purchased either as special access or as UNEs (Column D), and the percentage of DS1 circuits purchased as special access rather than as UNEs (Column E). The second spreadsheet (Attachment 2) provides the same information with respect to DS3 circuits.

To protect the confidentiality of these data, we have masked the name of each individual carrier (e.g., CLEC 001, CLEC 002 . . . etc.). In addition, we have combined the data for the three largest purchasers of high-capacity circuits (and their affiliates), so as to prevent these carriers' identities and individual totals from being determined by virtue of their size. We also have excluded carriers that purchase high-capacity circuits directly from the Bell companies and that operate only as wireless providers.

The attached data demonstrate that there are more than 200 competing carriers purchasing special access in one or more of the Bell companies' regions. In the four Bell companies' regions combined, 79 percent of the DS1 circuits and 95 percent of the DS3 circuits that competing carriers as a whole are purchasing are purchased as special access rather than as UNEs. When the three largest carriers are excluded, the data show that over 50 percent of the DS1 circuits and 88 percent of the DS3 circuits that competing carriers are purchasing are purchased as special access rather than as UNEs.

The data also show that, excluding the three largest purchasers of high-capacity circuits, more than 120 competing carriers are purchasing 100 percent of their DS1 circuits as special access rather than as UNEs, and that more than 110 carriers are purchasing 100 percent of their DS3 circuits as special access rather than as UNEs. An additional 20 competing carriers are purchasing 90 percent or more of their DS1 circuits as special access rather than as UNEs, and an additional eight carriers are purchasing 90 percent or more of their DS3 circuits as special access rather than as UNEs. Approximately 45 percent of competing carriers are purchasing more than half of their DS1 circuits as special access rather than as UNEs, and 75 percent of carriers are purchasing more than half of their DS3 circuits as special access rather than as UNEs.

If you have any questions regarding these data, please do not hesitate to contact me directly at (202) 326-7930.

Very truly yours,

/s/ Evan T. Leo

Attachments

cc:

D. Gonzalez
C. Libertelli
M. Brill
J. Rosenworcel
S. Bergmann
M. Carey
J. Carlisle
R. Hanser
I. Dilner
J. Miller

Column A	Column B	Column C	Column D	Column E
DS1s PURCHASED AS				
CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS1s	% PURCHASED AS SPECIAL ACCESS
THE THREE LARGEST PURCHASERS	823,606	5,504	829,110	99%
OTHER CARRIERS (MASKED)				
CLEC 091	3,099	-	3,099	100%
CLEC 030	2,513	-	2,513	100%
CLEC 040	2,187	-	2,187	100%
CLEC 062	1,988	-	1,988	100%
CLEC 246	1,544	-	1,544	100%
CLEC 012	1,323	-	1,323	100%
CLEC 180	1,167	-	1,167	100%
CLEC 295	446	-	446	100%
CLEC 285	380	-	380	100%
CLEC 087	358	-	358	100%
CLEC 354	356	-	356	100%
CLEC 322	355	-	355	100%
CLEC 271	349	-	349	100%
CLEC 346	330	-	330	100%
CLEC 042	323	-	323	100%
CLEC 148	304	-	304	100%
CLEC 123	267	-	267	100%
CLEC 084	257	-	257	100%
CLEC 353	222	-	222	100%
CLEC 194	205	-	205	100%
CLEC 167	183	-	183	100%
CLEC 066	169	-	169	100%
CLEC 065	159	-	159	100%
CLEC 216	126	-	126	100%
CLEC 098	85	-	85	100%
CLEC 139	75	-	75	100%
CLEC 320	75	-	75	100%
CLEC 294	70	-	70	100%
CLEC 244	60	-	60	100%
CLEC 314	54	-	54	100%
CLEC 262	53	-	53	100%
CLEC 255	52	-	52	100%
CLEC 303	46	-	46	100%
CLEC 186	41	-	41	100%
CLEC 230	34	-	34	100%
CLEC 290	32	-	32	100%
CLEC 124	28	-	28	100%
CLEC 218	25	-	25	100%
CLEC 254	21	-	21	100%
CLEC 340	20	-	20	100%
CLEC 351	19	-	19	100%
CLEC 237	15	-	15	100%
CLEC 174	14	-	14	100%
CLEC 107	14	-	14	100%
CLEC 252	13	-	13	100%
CLEC 178	12	-	12	100%
CLEC 318	12	-	12	100%
CLEC 279	12	-	12	100%
CLEC 206	12	-	12	100%

DS1s PURCHASED AS

CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS1s	% PURCHASED AS SPECIAL ACCESS
CLEC 074	11	-	11	100%
CLEC 010	11	-	11	100%
CLEC 301	11	-	11	100%
CLEC 158	10	-	10	100%
CLEC 280	10	-	10	100%
CLEC 350	10	-	10	100%
CLEC 026	9	-	9	100%
CLEC 236	9	-	9	100%
CLEC 277	9	-	9	100%
CLEC 057	8	-	8	100%
CLEC 261	8	-	8	100%
CLEC 250	8	-	8	100%
CLEC 348	8	-	8	100%
CLEC 053	7	-	7	100%
CLEC 211	6	-	6	100%
CLEC 329	6	-	6	100%
CLEC 077	5	-	5	100%
CLEC 075	4	-	4	100%
CLEC 060	4	-	4	100%
CLEC 101	4	-	4	100%
CLEC 201	4	-	4	100%
CLEC 245	4	-	4	100%
CLEC 212	4	-	4	100%
CLEC 243	4	-	4	100%
CLEC 321	4	-	4	100%
CLEC 055	3	-	3	100%
CLEC 169	3	-	3	100%
CLEC 241	3	-	3	100%
CLEC 268	3	-	3	100%
CLEC 327	3	-	3	100%
CLEC 116	2	-	2	100%
CLEC 152	2	-	2	100%
CLEC 017	2	-	2	100%
CLEC 082	2	-	2	100%
CLEC 113	2	-	2	100%
CLEC 135	2	-	2	100%
CLEC 159	2	-	2	100%
CLEC 059	2	-	2	100%
CLEC 129	2	-	2	100%
CLEC 126	2	-	2	100%
CLEC 033	2	-	2	100%
CLEC 073	2	-	2	100%
CLEC 278	2	-	2	100%
CLEC 235	2	-	2	100%
CLEC 203	2	-	2	100%
CLEC 257	2	-	2	100%
CLEC 291	2	-	2	100%
CLEC 112	1	-	1	100%
CLEC 064	1	-	1	100%
CLEC 051	1	-	1	100%
CLEC 072	1	-	1	100%
CLEC 013	1	-	1	100%
CLEC 142	1	-	1	100%
CLEC 050	1	-	1	100%

DS1s PURCHASED AS

CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS1s	% PURCHASED AS SPECIAL ACCESS
CLEC 081	1	-	1	100%
CLEC 100	1	-	1	100%
CLEC 105	1	-	1	100%
CLEC 039	1	-	1	100%
CLEC 052	1	-	1	100%
CLEC 208	1	-	1	100%
CLEC 258	1	-	1	100%
CLEC 316	1	-	1	100%
CLEC 249	1	-	1	100%
CLEC 289	1	-	1	100%
CLEC 292	1	-	1	100%
CLEC 276	1	-	1	100%
CLEC 344	1	-	1	100%
CLEC 313	1	-	1	100%
CLEC 209	1	-	1	100%
CLEC 296	1	-	1	100%
CLEC 224	1	-	1	100%
CLEC 307	1	-	1	100%
CLEC 256	15,070	3	15,073	100%
CLEC 233	2,882	1	2,883	100%
CLEC 231	2,019	1	2,020	100%
CLEC 046	3,083	2	3,085	100%
CLEC 205	56,855	46	56,901	100%
CLEC 147	28,300	33	28,333	100%
CLEC 222	819	2	821	100%
CLEC 335	11,407	45	11,452	100%
CLEC 334	2,604	13	2,617	100%
CLEC 172	3,347	27	3,374	99%
CLEC 131	114	1	115	99%
CLEC 259	16,854	174	17,028	99%
CLEC 151	20,139	227	20,366	99%
CLEC 228	142	2	144	99%
CLEC 144	743	19	762	98%
CLEC 286	82	3	85	96%
CLEC 168	115	5	120	96%
CLEC 200	4,875	325	5,200	94%
CLEC 214	9,644	727	10,371	93%
CLEC 326	20,592	1,986	22,578	91%
CLEC 019	241	27	268	90%
CLEC 251	142	23	165	86%
CLEC 076	2,190	462	2,652	83%
CLEC 207	402	105	507	79%
CLEC 028	1,082	404	1,486	73%
CLEC 009	13	5	18	72%
CLEC 079	4,180	1,822	6,002	70%
CLEC 187	252	132	384	66%
CLEC 089	104	57	161	65%
CLEC 282	37	21	58	64%
CLEC 080	200	115	315	63%
CLEC 022	4,899	3,130	8,029	61%
Verizon Misc.*	12,597	10,475	23,072	55%
CLEC 232	26	22	48	54%
CLEC 146	17	15	32	53%
CLEC 182	9,148	9,341	18,489	49%

DS1s PURCHASED AS

CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS1s	% PURCHASED AS SPECIAL ACCESS
CLEC 056	2,831	3,058	5,889	48%
CLEC 338	11	13	24	46%
CLEC 041	86	104	190	45%
CLEC 143	35	47	82	43%
CLEC 184	2,931	4,622	7,553	39%
CLEC 002	3	7	10	30%
CLEC 153	7	17	24	29%
CLEC 298	4	10	14	29%
CLEC 156	542	1,421	1,963	28%
CLEC 273	25,977	68,852	94,829	27%
CLEC 219	258	690	948	27%
CLEC 319	4,027	11,864	15,891	25%
CLEC 054	485	1,431	1,916	25%
CLEC 345	2,685	8,464	11,149	24%
CLEC 165	65	222	287	23%
CLEC 069	11	38	49	22%
CLEC 071	2,173	8,163	10,336	21%
CLEC 133	1,276	5,005	6,281	20%
CLEC 049	13	61	74	18%
CLEC 305	15	72	87	17%
CLEC 355	11	57	68	16%
CLEC 008	476	2,668	3,144	15%
CLEC 263	205	1,265	1,470	14%
CLEC 005	1,006	6,658	7,664	13%
CLEC 023	1	7	8	13%
CLEC 035	1	7	8	13%
CLEC 032	197	1,393	1,590	12%
CLEC 333	19	141	160	12%
CLEC 090	167	1,243	1,410	12%
CLEC 266	192	1,443	1,635	12%
CLEC 104	12	97	109	11%
CLEC 106	79	727	806	10%
CLEC 068	4	39	43	9%
CLEC 134	88	888	976	9%
CLEC 130	263	2,899	3,162	8%
CLEC 179	495	5,481	5,976	8%
CLEC 145	6	71	77	8%
CLEC 300	74	887	961	8%
CLEC 170	3	39	42	7%
CLEC 274	364	5,449	5,813	6%
CLEC 347	2,131	31,993	34,124	6%
CLEC 308	62	933	995	6%
CLEC 138	2	31	33	6%
CLEC 185	343	5,326	5,669	6%
CLEC 284	10	163	173	6%
CLEC 227	2	33	35	6%
CLEC 063	291	4,928	5,219	6%
CLEC 149	511	8,755	9,266	6%
CLEC 196	67	1,327	1,394	5%
CLEC 242	12	240	252	5%
CLEC 006	1	21	22	5%
CLEC 047	5	112	117	4%
CLEC 343	5	120	125	4%
CLEC 164	135	3,769	3,904	3%

DS1s PURCHASED AS

CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS1s	% PURCHASED AS SPECIAL ACCESS
CLEC 125	4	120	124	3%
CLEC 358	4	134	138	3%
CLEC 217	14	478	492	3%
CLEC 269	5	180	185	3%
CLEC 173	2	72	74	3%
CLEC 283	3	113	116	3%
CLEC 036	4	163	167	2%
CLEC 240	2	92	94	2%
CLEC 099	1	48	49	2%
CLEC 020	72	3,459	3,531	2%
CLEC 150	1	54	55	2%
CLEC 117	9	706	715	1%
CLEC 288	1	83	84	1%
CLEC 193	85	8,354	8,439	1%
CLEC 188	10	1,211	1,221	1%
CLEC 136	2	249	251	1%
CLEC 171	1	127	128	1%
CLEC 176	1	166	167	1%
CLEC 323	45	7,760	7,805	1%
CLEC 248	44	9,356	9,400	0%
CLEC 195	2	994	996	0%
CLEC 177	1	649	650	0%
CLEC 015	1	1,062	1,063	0%
CLEC 038	4	6,239	6,243	0%
CLEC 132	-	16,682	16,682	0%
CLEC 140	-	1,128	1,128	0%
CLEC 155	-	756	756	0%
CLEC 083	-	687	687	0%
CLEC 197	-	466	466	0%
CLEC 304	-	314	314	0%
CLEC 275	-	313	313	0%
CLEC 163	-	268	268	0%
CLEC 031	-	202	202	0%
CLEC 048	-	197	197	0%
CLEC 162	-	176	176	0%
CLEC 119	-	171	171	0%
CLEC 213	-	162	162	0%
CLEC 336	-	157	157	0%
CLEC 114	-	146	146	0%
CLEC 110	-	137	137	0%
CLEC 045	-	124	124	0%
CLEC 097	-	124	124	0%
CLEC 018	-	115	115	0%
CLEC 175	-	114	114	0%
CLEC 061	-	110	110	0%
CLEC 128	-	109	109	0%
CLEC 356	-	95	95	0%
CLEC 293	-	95	95	0%
CLEC 121	-	91	91	0%
CLEC 078	-	89	89	0%
CLEC 108	-	82	82	0%
CLEC 016	-	71	71	0%
CLEC 238	-	65	65	0%
CLEC 239	-	59	59	0%

DS1s PURCHASED AS

CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS1s	% PURCHASED AS SPECIAL ACCESS
CLEC 034	-	54	54	0%
CLEC 234	-	54	54	0%
CLEC 027	-	51	51	0%
CLEC 302	-	50	50	0%
CLEC 161	-	49	49	0%
CLEC 029	-	49	49	0%
CLEC 070	-	48	48	0%
CLEC 088	-	47	47	0%
CLEC 122	-	43	43	0%
CLEC 191	-	42	42	0%
CLEC 342	-	38	38	0%
CLEC 154	-	37	37	0%
CLEC 339	-	37	37	0%
CLEC 058	-	35	35	0%
CLEC 189	-	32	32	0%
CLEC 221	-	32	32	0%
CLEC 111	-	31	31	0%
CLEC 103	-	30	30	0%
CLEC 190	-	30	30	0%
CLEC 312	-	29	29	0%
CLEC 317	-	29	29	0%
CLEC 044	-	28	28	0%
CLEC 199	-	28	28	0%
CLEC 120	-	27	27	0%
CLEC 102	-	26	26	0%
CLEC 157	-	23	23	0%
CLEC 043	-	20	20	0%
CLEC 021	-	18	18	0%
CLEC 160	-	17	17	0%
CLEC 025	-	16	16	0%
CLEC 118	-	16	16	0%
CLEC 267	-	16	16	0%
CLEC 183	-	14	14	0%
CLEC 109	-	14	14	0%
CLEC 309	-	14	14	0%
CLEC 094	-	12	12	0%
CLEC 198	-	12	12	0%
CLEC 014	-	11	11	0%
CLEC 225	-	11	11	0%
CLEC 229	-	11	11	0%
CLEC 004	-	10	10	0%
CLEC 253	-	10	10	0%
CLEC 086	-	9	9	0%
CLEC 337	-	8	8	0%
CLEC 166	-	7	7	0%
CLEC 192	-	7	7	0%
CLEC 260	-	7	7	0%
CLEC 181	-	5	5	0%
CLEC 085	-	5	5	0%
CLEC 202	-	5	5	0%
CLEC 265	-	5	5	0%
CLEC 093	-	4	4	0%
CLEC 306	-	4	4	0%
CLEC 281	-	4	4	0%

DS1s PURCHASED AS

CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS1s	% PURCHASED AS SPECIAL ACCESS
CLEC 096	-	3	3	0%
CLEC 204	-	3	3	0%
CLEC 330	-	3	3	0%
CLEC 247	-	3	3	0%
CLEC 011	-	2	2	0%
CLEC 007	-	2	2	0%
CLEC 141	-	2	2	0%
CLEC 264	-	2	2	0%
CLEC 310	-	2	2	0%
CLEC 359	-	2	2	0%
CLEC 315	-	2	2	0%
CLEC 331	-	2	2	0%
CLEC 037	-	1	1	0%
CLEC 092	-	1	1	0%
CLEC 003	-	1	1	0%
CLEC 024	-	1	1	0%
CLEC 299	-	1	1	0%
CLEC 332	-	1	1	0%
CLEC 352	-	1	1	0%
CLEC 349	-	1	1	0%
CLEC 325	-	1	1	0%
CLEC 226	-	1	1	0%
CLEC 311	-	1	1	0%
TOTAL FOR THE THREE LARGEST PURCHASERS	823,606	5,504	829,110	99%
TOTAL FOR OTHER CARRIERS (EXCLUDING WIRELESS)	305,965	299,653	605,618	51%
GRAND TOTAL (EXCLUDING WIRELESS)	1,129,571	305,157	1,434,728	79%

Notes

*Verizon Misc. reflects totals that could not be assigned to individual carriers.

Data are as of March 2004 for Verizon; September and October 2004 for SBC UNEs and special access, respectively; and October 2004 for Qwest and BellSouth.

Carriers that purchase high-capacity circuits directly from the Bell companies and that operate only as wireless providers were excluded.

Some of the carriers purchasing high-capacity circuits may operate as ISPs in whole or in part.

Verizon and BellSouth data include entrance facilities; Qwest data exclude entrance facilities. SBC excluded entrance facilities from its UNE data and estimated the number of special access channel terminations that are entrance facilities and excluded these data. UNE data for all BOCs include stand-alone loops and EELs.

Column A	Column B	Column C	Column D	Column E
DS3s PURCHASED AS				
CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS3s	% PURCHASED AS SPECIAL ACCESS
THE THREE LARGEST PURCHASERS	16,679	5	16,684	100%
OTHER CARRIERS (MASKED)				
CLEC 205	1,867	-	1,867	100%
CLEC 147	869	-	869	100%
CLEC 151	720	-	720	100%
CLEC 233	496	-	496	100%
CLEC 259	227	-	227	100%
CLEC 246	206	-	206	100%
CLEC 022	147	-	147	100%
CLEC 040	119	-	119	100%
CLEC 149	71	-	71	100%
CLEC 172	58	-	58	100%
CLEC 012	57	-	57	100%
CLEC 148	55	-	55	100%
CLEC 030	42	-	42	100%
CLEC 091	39	-	39	100%
CLEC 256	39	-	39	100%
CLEC 042	37	-	37	100%
CLEC 323	28	-	28	100%
CLEC 087	24	-	24	100%
CLEC 076	20	-	20	100%
CLEC 051	18	-	18	100%
CLEC 285	18	-	18	100%
CLEC 019	17	-	17	100%
CLEC 295	17	-	17	100%
CLEC 009	17	-	17	100%
CLEC 230	14	-	14	100%
CLEC 193	14	-	14	100%
CLEC 062	13	-	13	100%
CLEC 124	13	-	13	100%
CLEC 131	12	-	12	100%
CLEC 271	12	-	12	100%
CLEC 357	12	-	12	100%
CLEC 200	10	-	10	100%
CLEC 194	10	-	10	100%
CLEC 286	10	-	10	100%
CLEC 262	10	-	10	100%
CLEC 228	10	-	10	100%
CLEC 084	9	-	9	100%
CLEC 144	9	-	9	100%
CLEC 186	9	-	9	100%
CLEC 346	9	-	9	100%
CLEC 351	8	-	8	100%
CLEC 168	8	-	8	100%
CLEC 054	7	-	7	100%
CLEC 216	7	-	7	100%
CLEC 244	7	-	7	100%
CLEC 353	6	-	6	100%
CLEC 222	6	-	6	100%
CLEC 303	6	-	6	100%
CLEC 320	6	-	6	100%
CLEC 287	6	-	6	100%

DS3s PURCHASED AS

CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS3s	% PURCHASED AS SPECIAL ACCESS
CLEC 152	5	-	5	100%
CLEC 158	5	-	5	100%
CLEC 129	5	-	5	100%
CLEC 358	5	-	5	100%
CLEC 297	5	-	5	100%
CLEC 066	4	-	4	100%
CLEC 098	4	-	4	100%
CLEC 057	4	-	4	100%
CLEC 217	4	-	4	100%
CLEC 294	4	-	4	100%
CLEC 327	4	-	4	100%
CLEC 290	4	-	4	100%
CLEC 250	4	-	4	100%
CLEC 348	4	-	4	100%
CLEC 020	3	-	3	100%
CLEC 130	3	-	3	100%
CLEC 237	3	-	3	100%
CLEC 275	3	-	3	100%
CLEC 322	3	-	3	100%
CLEC 236	3	-	3	100%
CLEC 215	3	-	3	100%
CLEC 263	3	-	3	100%
CLEC 064	2	-	2	100%
CLEC 106	2	-	2	100%
CLEC 127	2	-	2	100%
CLEC 159	2	-	2	100%
CLEC 010	2	-	2	100%
CLEC 328	2	-	2	100%
CLEC 266	2	-	2	100%
CLEC 314	2	-	2	100%
CLEC 240	2	-	2	100%
CLEC 241	2	-	2	100%
CLEC 334	2	-	2	100%
CLEC 355	2	-	2	100%
CLEC 203	2	-	2	100%
CLEC 313	2	-	2	100%
CLEC 279	2	-	2	100%
CLEC 220	2	-	2	100%
CLEC 143	1	-	1	100%
CLEC 088	1	-	1	100%
CLEC 174	1	-	1	100%
CLEC 018	1	-	1	100%
CLEC 146	1	-	1	100%
CLEC 187	1	-	1	100%
CLEC 072	1	-	1	100%
CLEC 032	1	-	1	100%
CLEC 178	1	-	1	100%
CLEC 077	1	-	1	100%
CLEC 115	1	-	1	100%
CLEC 033	1	-	1	100%
CLEC 067	1	-	1	100%
CLEC 242	1	-	1	100%
CLEC 299	1	-	1	100%
CLEC 341	1	-	1	100%
CLEC 272	1	-	1	100%

DS3s PURCHASED AS

CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS3s	% PURCHASED AS SPECIAL ACCESS
CLEC 324	1	-	1	100%
CLEC 269	1	-	1	100%
CLEC 354	1	-	1	100%
CLEC 206	1	-	1	100%
CLEC 210	1	-	1	100%
CLEC 305	1	-	1	100%
CLEC 350	1	-	1	100%
CLEC 321	1	-	1	100%
CLEC 047	1	-	1	100%
CLEC 180	577	4	581	99%
CLEC 133	190	4	194	98%
CLEC 214	258	6	264	98%
CLEC 231	68	2	70	97%
CLEC 184	158	6	164	96%
CLEC 196	15	1	16	94%
CLEC 079	158	15	173	91%
CLEC 071	20	2	22	91%
CLEC 335	8	1	9	89%
CLEC 046	7	1	8	88%
Verizon Misc.*	329	57	386	85%
CLEC 028	22	5	27	81%
CLEC 134	11	3	14	79%
CLEC 347	123	36	159	77%
CLEC 089	13	4	17	76%
CLEC 195	6	2	8	75%
CLEC 273	573	200	773	74%
CLEC 182	247	94	341	72%
CLEC 008	50	20	70	71%
CLEC 056	62	27	89	70%
CLEC 319	59	26	85	69%
CLEC 232	9	4	13	69%
CLEC 156	26	12	38	68%
CLEC 069	2	1	3	67%
CLEC 063	2	1	3	67%
CLEC 219	23	13	36	64%
CLEC 080	3	2	5	60%
CLEC 326	93	88	181	51%
CLEC 109	2	2	4	50%
CLEC 345	15	21	36	41%
CLEC 005	19	32	51	37%
CLEC 300	14	26	40	35%
CLEC 145	8	18	26	31%
CLEC 044	1	3	4	25%
CLEC 185	2	10	12	17%
CLEC 179	7	50	57	12%
CLEC 308	1	8	9	11%
CLEC 165	1	9	10	10%
CLEC 164	2	26	28	7%
CLEC 132	-	274	274	0%
CLEC 162	-	23	23	0%
CLEC 248	-	13	13	0%
CLEC 183	-	7	7	0%
CLEC 171	-	6	6	0%
CLEC 188	-	2	2	0%
CLEC 045	-	2	2	0%

DS3s PURCHASED AS

CARRIER	SPECIAL ACCESS	UNEs	TOTAL DS3s	% PURCHASED AS SPECIAL ACCESS
CLEC 120	-	2	2	0%
CLEC 110	-	2	2	0%
CLEC 015	-	2	2	0%
CLEC 085	-	2	2	0%
CLEC 227	-	2	2	0%
CLEC 128	-	1	1	0%
CLEC 034	-	1	1	0%
CLEC 176	-	1	1	0%
CLEC 083	-	1	1	0%
CLEC 061	-	1	1	0%
CLEC 070	-	1	1	0%
CLEC 103	-	1	1	0%
CLEC 114	-	1	1	0%
CLEC 025	-	1	1	0%
CLEC 086	-	1	1	0%
CLEC 160	-	1	1	0%
CLEC 097	-	1	1	0%
CLEC 090	-	1	1	0%
CLEC 191	-	1	1	0%
CLEC 199	-	1	1	0%
CLEC 234	-	1	1	0%
CLEC 317	-	1	1	0%
CLEC 221	-	1	1	0%
CLEC 284	-	1	1	0%
CLEC 223	-	1	1	0%
CLEC 265	-	1	1	0%
CLEC 338	-	1	1	0%
CLEC 213	-	1	1	0%
CLEC 267	-	1	1	0%
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TOTAL FOR THE THREE LARGEST PURCHASERS	16,679	5	16,684	100%
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TOTAL FOR OTHER CARRIERS (EXCLUDING WIRELESS)	8,775	1,203	9,978	88%
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GRAND TOTAL (EXCLUDING WIRELESS)	25,454	1,208	26,662	95%

Notes

*Verizon Misc. reflects totals that could not be assigned to individual carriers.

Data are as of March 2004 for Verizon; September and October 2004 for SBC UNEs and special access, respectively; and October 2004 for Qwest and BellSouth.

Carriers that purchase high-capacity circuits directly from the Bell companies and that operate only as wireless providers were excluded.

Some of the carriers purchasing high-capacity circuits may operate as ISPs in whole or in part.

Verizon and BellSouth data include entrance facilities; Qwest data exclude entrance facilities. SBC excluded entrance facilities from its UNE data and estimated the number of special access channel terminations that are entrance facilities and excluded these data. UNE data for all BOCs include stand-alone loops and EELs.